

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services and	)	CC Docket No. 03-123
And Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	
	)	
Access to Emergency Services	)	

**COMMENTS OF  
TELECOMMUNICATIONS FOR THE DEAF, INC.**

**I.     Introduction**

Telecommunications for the Deaf, Inc. (“TDI”) hereby submits these comments in the above-captioned proceeding. Access to 911 and enhanced 911 (E911) resources is a vital public safety goal, and TDI appreciates the work the Commission has done to ensure that all Americans, including those with disabilities, have access to these fundamental resources. TDI believes the Commission should ensure that E911 services are available to all users of Video Relay Service (“VRS”) and Internet Protocol (“IP”) Relay. However, TDI notes that numerous technological challenges exist which will require industry, consumer groups and government to collaborate with each other to ensure that E911 services are available to users of these technologies.

**II.    Comments**

At this time, TDI is not taking a position on whether it supports or opposes registration of VRS and IP-Relay service users as an interim solution in obtaining location information to provide to public safety answering points (“PSAPs”). However, in the event the Commission adopts registration requirements, TDI would like to see registration replaced by automatic

location information (“ALI”) that does not rely upon registration once non-registration ALI is developed for Voice over Internet Protocol (“VoIP”). Further, if there is a registration requirement, it must include (1) corresponding systems and protocols to ensure that such a requirement be as easy and straightforward as possible for end users of these services; (2) a shared registration database so that end-users are not subject to multiple registration requirements; (3) procedures for users to quickly update their location information; and (4) treatment of registration information as customer proprietary information, available only to emergency call handlers and those managing the registration database.

Concerning the use of the existing wireline 911 infrastructure, the relatively small volume of VRS and IP Relay 911 calls does not necessitate direct service provider trunking to all PSAPs throughout the United States. This would be highly burdensome and costly to the TRS Fund, and would disproportionately affect the end users of these services. Instead, service providers should be able to use the already existing VRS and IP-Relay 911 call centers to forward emergency calls to the appropriate PSAP. The centers should each have a database and directory of PSAPs so as to contact any PSAP in the country for a 911 call, based on the location of the caller.

Emergency calls should be designated as “top priority” in the call centers, and should be answered and handled as such. In this regard, VRS interoperability is essential so that if a 911 caller cannot reach one VRS provider, the caller can try another provider. In addition, procedures should be established so that in the event all of the Communications Assistants are occupied, one of the calls in progress can be suspended while a Communications Assistant answers the 911 call. While this solution would require an exemption to the current rules governing Communications Assistant interruptions, TDI believes that call center users would

understand, and step aside for 911 emergency calls much like motorists move to the shoulder of the road when an ambulance needs to move through traffic.

Regarding TRS funding, if an allocation between the interstate and intrastate TRS funds for VRS and IP-Relay is established, there would first need to be a requirement that VRS and IP-Relay are mandatory services under the Commission rules. Otherwise, some states may not fund VRS or IP-Relay, and an allocation would result in non-funding.

### **III. Conclusion**

Access to enhanced emergency services is an important public safety goal, and users of VRS and IP-Relay services should be afforded such access. While there are numerous technological challenges that must be overcome to realize this goal, TDI believes that collaboration among industry, consumer groups and government can lead to effective and efficient deployment of emergency services to VRS and IP-Relay users. TDI will continue to examine the issues presented in this proceeding, as well as the views of the commenters, and looks forward to providing additional comments and suggestions in future filings.

Respectfully submitted,

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Claude L. Stout  
Executive Director  
Telecommunications for the Deaf, Inc.  
8630 Fenton Street, Suite 604  
Silver Spring, MD 20910

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